

## REMARKS

This is in response to the Office Action mailed May 28, 2003. Applicant respectfully traverses and request reconsideration.

### Amendments to claims 23-26

Applicant respectfully submits, for the Examiner's consideration, amended claims 23-26. It is submitted that these claims do add any new matter as the limitation of the recognized audio command or dialog manager command being submitted to a form field is presented in the originally filed application. See specifically, page 24, lines 9-13 which provide for the insertion of the recognized audio command into a form. Furthermore, the specification, as filed, discloses that the dialog manager may thereupon perform any suitable operation upon reception of the at least one recognized audio command, including accessing an external content server. As such, it is submitted the amendments to claims 23-26 are proper and do not add any new matter beyond the originally filed disclosure.

### Rejections under 35 U.S.C. §103

#### Claims 23, 25, 2, 4-6, 13 and 15-18

Claims 2, 4-6, 13, 15-18, 23 and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Baruch et al., U.S. Patent Publication No. 2002/0091518 A1, ("Baruch") in view of Lai et al., U.S. Patent No. 6,006,183, ("Lai"), and further in view of Scott et al., U.S. Patent No. 6,101,473, ("Scott"). Applicant respectfully traverses and the submits the rejection is improper as the combination of the above-noted references fails to teach or suggest all of the claimed limitations.

For the sake of brevity, Applicant resubmits the previously offered position regarding the teachings of Baruch and Lai. As understood, Scott is directed to, *inter alia*, a speech browser allowing for the access of the internet using a telephone network and a speech server. Scott teaches, *inter alia*, voice activated web browsing using an intermediate voice browser 7 in a speech/web server 8 as an intermediate for a local web browser 1. Scott uses existing Applied Speech Technology Protocols (ASTPs) for receiving/translating web browsing commands and then retrieving the request URL. Scott teaches, *inter alia*, a pass-through system enable voice

activated web browser but does not teach interactivity with web browser other than web page retrieval.

Claims 23 and 25, as amended, recite "inserting the at least one recognized audio command / dialog manager command within a form." None of the prior art references teach or suggest, either individually or in combination, inserting the recognized audio command / dialog manager command within a form. Baruch does not teach or suggest a form-based system, but rather discloses multiple voice recognition engines for determining voice activated dialing, Lai discloses weighting various recognition results, and as discussed above, Scott teaches a passive voice browser that allows for voice activated data retrieval without form-based interaction. Therefore, none of the prior art references teach or suggest all of the claimed limitations and for at least the reasons stated above, claims 23 and 25 contain patentable subject matter in view thereof. As such, reconsideration and withdrawal of the present rejection is respectfully requested.

Regarding claims 2, 4-6, 13, 15-18, Applicant respectfully resubmits the above position regarding independent claims 23 and 25 and submits these claims add further patentable subject matter in view thereof. As such, it is submitted that these claims are allowed not merely as being dependent upon an allowable base claim. Reconsideration, withdrawal of the present rejection and the passage of these claims to issuance is respectfully requested.

Claims 24, 26, 3, 8-11 and 22

Claims 3, 8-11, 21, 22, 24 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Baruch in view of Lai and Scott, and further in view of Baker, U.S. Patent No. 6,122,613, ("Baker"). Applicant respectfully traverses and submits the rejection is improper as the prior art references fail to teach or suggest all of the claimed limitations.

For the sake of brevity, Applicant resubmits the previously submitted positions regarding the teachings of Baruch, Lai, Baker and resubmits the above position regarding Scott.

Claims 24 and 26, as amended, provide for, among other things, inserting the at least one recognized audio command / dialog manager command within a form. None of the prior art references teach or suggest, either individually or in combination, inserting the recognized audio

command / dialog manager command within a form. Baruch does not teach or suggest of a form-based system, but rather discloses multiple voice recognition engines for determining voice activated dialing, Lai discloses weighting various recognition results, Scott teaches a passive voice browser that allows for voice activated data retrieval without form-based interaction and Baker discloses a multiple recognition dictation transcription system that includes no form based interactivity, but rather seeks to generate transcription. Therefore, none of the prior art references teach or suggest all of the claimed limitations and for at least the reasons stated above, claims 24 and 26 contain patentable subject matter in view thereof. As such, reconsideration and withdrawal of the present rejection is respectfully requested.

Regarding claims 3, 8-11, 21, 22, Applicant respectfully resubmits the above position regarding independent claims 24 and 26 and submits these claims add further patentable subject matter in view thereof. As such, it is submitted that these claims are allowed not merely as being dependent upon an allowable base claim. Reconsideration, withdrawal of the present rejection and the passage of these claims to issuance is respectfully requested.

Accordingly, Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Date: August 28, 2003

Respectfully submitted,

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